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By ECF

Honorable Robert M. Levy
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Ins. Co., et al. v. Jacobson, et al.*
Docket No. 15-cv-7236 (ERK)(RML)
RR File No.: 005100-01007

Dear Magistrate Judge Levy:

Pursuant to Your Honor's Individual Rules 2(E), this letter serves as the Parties' joint request for an extension of the deadline to complete fact and expert discovery. See November 18, 2016 Docket Entry.

The current deadline to complete factual discovery is February 21, 2017 and expert discovery is scheduled to be completed by April 21, 2017. The Parties respectfully request an extension of time to complete: (i) fact discovery by May 22, 2017; and (ii) expert discovery by July 24, 2017.

This is the second request to extend the time to complete fact and expert discovery. This joint application is made along with Nicholas Bowers, Esq., counsel for Bruce Jacobsen, D.C., BMJ Chiropractic, P.C., NJ Pain Treatment, P.C., Jacobsen Chiropractic, P.C., Dr. Bruce Jacobsen DC, P.C., and NJ Neuro & Pain, P.C., as well as Howard Foster, Esq., counsel for Gerlando Zambuto, Diana Beynin, Peter Albis, and J.D. Park (collectively, "Jacobson Defendants").¹

As the Court is aware, Mr. Bowers and Mr. Foster's firms were retained by the Jacobson Defendants in November 2016. Since that time, the parties have been amicable exchanging written discovery with the full expectation that continued productions (from both sides) will be made in the upcoming month. However, given the sheer volume of written documentation subject to production ahead of the parties' depositions, the Parties request the within extension.

¹ Mr. Foster is also co-counsel on behalf of Bruce Jacobsen, D.C., BMJ Chiropractic, P.C., NJ Pain Treatment, P.C., Jacobsen Chiropractic, P.C., Dr. Bruce Jacobsen DC, P.C., and NJ Neuro & Pain, P.C.

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Additionally, the Parties are currently in the process of serving deposition notices for the parties as well as additional subpoenas seeking certain non-party depositions. Given the number of parties to be deposed (13 Defendants and representative of Plaintiff), the parties request the within extension in order to provide enough time to complete all depositions.

We thank the Court for its consideration of this request.

Respectfully submitted,

RIVKIN RADLER LLP

A handwritten signature of Ryan Goldberg, consisting of a stylized, flowing line.

Ryan Goldberg (RG 7570)

cc: All counsel via ECF